

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

_____	)	
In re:	)	Chapter 15
	)	
PERFORADORA ORO NEGRO, S. DE R.L. DE	)	Case No. 18-11094 (SCC)
C.V., <i>et al.</i> ,	)	
	)	
Debtors.	)	
_____	)	
FERNANDO PEREZ-CORREA IN HIS	)	Adv. Pro. No. 19-01360 (SCC)
CAPACITY AS FOREIGN REPRESENTATIVE	)	
OF PERFORADORA ORO NEGRO, S. DE R.L.	)	
DE C.V., <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
ASIA RESEARCH AND CAPITAL	)	
MANAGEMENT LTD., <i>et al.</i> ,	)	
	)	
Defendants.	)	
_____	)	

**[PROPOSED] ORDER GRANTING SINGAPORE  
RIG OWNERS' MOTION TO DISMISS**

**WHEREAS**, the Plaintiffs, Fernando Perez-Correa, in his capacity as Foreign Representative of both Integradora de Servicios Petroleros Oro Negro, S.A.P.I. de C.V. and Perforadora Oro Negro, S. de R.L. de C.V., Jose Antonio Cañedo-White, Carlos Williamson-Nasi, Gonzalo Gil-White and Miguel Angel Villegas-Vargas (together, the “**Plaintiffs**”) commenced this adversary proceeding against, among others, Defendants Oro Negro Primus, Oro Negro Laurus, Oro Negro Fortius, Oro Negro Decus, and Oro Negro

Impetus (together, the “**Singapore Rig Owners**”) by filing a complaint on September 26, 2019 (the “**Complaint**”);

**WHEREAS**, On October 31, 2019, the Singapore Rig Owners filed a motion to dismiss the Complaint and a memorandum of law in support thereof (the “**Motion to Dismiss**”);

**WHEREAS**, the Plaintiffs filed pleadings in opposition to the Motion to Dismiss and the Singapore Rig Owners filed a reply in further support of the Motion to Dismiss, and

**WHEREAS**, the Court considered all pleadings, objections and replies filed in respect of the Motion to Dismiss, and held a hearing on the Motion to Dismiss on [DATE];

And upon all pleadings, arguments of counsel and the record of the hearing,

**IT IS HEREBY ORDERED** as follows:

1. The Motion to Dismiss is granted in all respects.
2. The Complaint as against the Singapore Rig Owners shall be and hereby is dismissed with prejudice.

Dated: New York, New York  
[DATE]

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THE HONORABLE SHELLEY C. CHAPMAN  
UNITED STATES BANKRUPTCY JUDGE